

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION OF THE APPLICATION	)	
OF DELMARVA POWER & LIGHT COMPANY,	)	
EXELON CORPORATION, PEPCO HOLDINGS	)	PSC DOCKET NO. 14-193
INC., PURPLE ACQUISITION CORPORATION,	)	
EXELON ENERGY DELIVERY COMPANY, LLC	)	
AND SPECIAL PURPOSE ENTITY, LLC	)	
FOR APPROVALS UNDER THE PROVISIONS	)	
OF 26 <i>Del.</i> §§ 215 AND 1016	)	
(FILED JUNE 18, 2014)	)	

**PETITION OF THE MID-ATLANTIC RENEWABLE ENERGY COALITION  
FOR LEAVE TO INTERVENE**

Pursuant to Rule 21 of the Commission's Rules of Practice, the Mid-Atlantic Renewable Energy Coalition ("MAREC") hereby petitions to intervene in the above-captioned matter. In support of the Petition, MAREC states:

1. MAREC'S mailing and email addresses, and telephone and fax numbers are:

208 Stonegate Way  
Camden, DE, 19934  
Phone: 302-331-4639  
[bburcat@marec.us](mailto:bburcat@marec.us)

2. MAREC is a nonprofit corporation, which was formed to help enhance the opportunities for renewable energy development primarily in the region where the Regional Transmission Organization, PJM Interconnection, LLC ("PJM"), operates. MAREC's footprint includes Delaware, Maryland, New Jersey, Pennsylvania, Virginia, Ohio, West Virginia, North Carolina, and the District of Columbia. MAREC's membership consists of wind developers, wind turbine manufacturers, service companies, nonprofit organizations and a transmission company dedicated to the growth of renewable energy technologies to improve our environment, boost economic development in the region and diversify our electric generation portfolio, thereby enhancing energy security. The primary areas of focus of MAREC are to work

with state regulators to develop rules and supportive policies for renewable energy; provide education and expertise on the environmental sustainability of wind energy; and offer technical expertise and advice on integrating variable wind energy resources into the electric grid.

MAREC members have developed a number of wind energy projects in the region. Many of the wind turbines that have been installed regionally have been manufactured by MAREC members.

2. MAREC has a substantial interest in this matter that is not adequately represented by other parties in the proceeding. MAREC members are committed to significant growth in renewable energy technologies to support economic development in the region and helping to meet the aggressive legislative mandate for renewable energy through Delaware's renewable portfolio standard. MAREC is in the position of providing its experienced position on Delmarva Power's long-term planning as it relates to renewables. The interests of MAREC's members may not be fully developed if MAREC is not permitted leave to intervene.

3. The interests of MAREC and its members are affected by the proposed proceeding, which may impact renewable growth within the region and future opportunities for MAREC members. In addition, the merger may impact the membership structure within PJM with ramifications for MAREC members participating in PJM.

4. MAREC requests that it be served with copies of all filings and pleadings addressed to the following:

Bruce H. Burcat, Esq.  
Executive Director  
Mid-Atlantic Renewable Energy Coalition  
208 Stonegate Way  
Camden, DE 19934  
Phone: (302) 331-4639  
Email - [bburcat@marec.us](mailto:bburcat@marec.us)

WHEREFORE, MAREC respectfully requests that it be granted *Leave to Intervene* and that it be granted status as a party in the above-captioned matter with all of the rights thereof.

Respectfully submitted,



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Francis J. Murphy, Esq. (No. 223) *Local Counsel*  
Murphy and Landon  
1011 Centre Rd Suite 210  
Wilmington, DE 19805-1267  
Phone: (302) 472-8103  
[fmurphy@msllaw.com](mailto:fmurphy@msllaw.com)



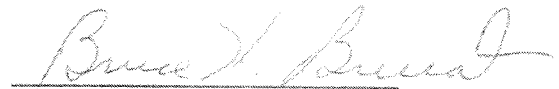
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Bruce H. Burcat, Esq., *Pro Hac Vice pending*  
Executive Director  
Mid-Atlantic Renewable Energy Coalition  
208 Stonegate Way  
Camden, DE 19934  
Phone: (302) 331-4639  
[bburcat@marec.us](mailto:bburcat@marec.us)

Date: July 28, 2013

VERIFICATION STATEMENT TO PETITION TO INTERVENE

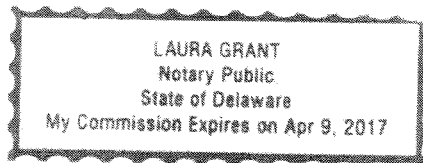
I, Bruce H. Burcat, representing the Mid-Atlantic Renewable Energy Coalition ("MAREC") as its Executive Director, hereby verifies that the statements made in the *Petition for Leave to Intervene* for Delaware Public Service Commission *Docket No. 14-193*, executed by Francis J. Murphy, dated July 28, 2014, as counsel for MAREC are true to the best of my knowledge and ability.

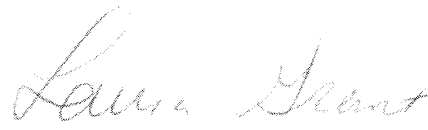
  
Bruce H. Burcat

STATE OF DELAWARE

KENT COUNTY

Subscribe and sworn to before me this 28 day of July, 2014.



  
Notary Public

My Commission Expires: April 9, 2017

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION OF	)	
DELMARVA POWER & LIGHT COMPANY	)	
EXELON CORPORATION, PEPCO HOLDINGS,	)	
INC., PURPLE ACQUISITION CORPORATION,	)	
EXELON ENERGY DELIVERY COMPANY, LLC	)	PSC. DOCKET NO. 14-193
AND SPECIAL PURPOSE ENTITY, LLC	)	
FOR APPROVALS UNDER THE PROVISIONS	)	
OF 26 <i>Del. C. §§</i> 215 AND 1016	)	
(Filed June 18, 2014)	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2014 I caused the attached **PETITION OF THE MID-ATLANTIC RENEWABLE ENERGY COALITION FOR LEAVE TO INTERVENE** to be served on the persons on the attached service list in the matter indicated thereon.

/s/ Francis J. Murphy  
Francis J. Murphy, Esq. #223  
MURPHY & LANDON  
1011 Centre Road, Suite 210  
Wilmington, DE 19805  
Telephone: (302) 472-8100  
Facsimile: (302) 472-8135  
Counsel for Petitioner

**SERVICE LIST**  
**PSC Docket No. 14-193**

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